

ROBINS, KAPLAN, MILLER & CIRESI LLP

2800 LA SALLE PLAZA
800 LA SALLE AVENUE
MINNEAPOLIS, MN 55402-2015
TEL: 612-349-8500 FAX: 612-339-4181
www.rkmc.com

ATTORNEYS AT LAW

JESSE CALM
612-349-0114

September 3, 2008

VIA ECF

The Honorable Magistrate Judge James Orenstein
225 Cadman Plaza East
Room 456 North
Brooklyn, NY 11201

Re: In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation
1:05-MD-1720-(JG)(JO) / Our File No.: 123630.0000

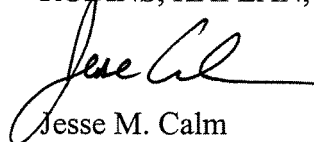
Dear Magistrate Judge Orenstein:

On August 19, 2008, Defendants served a 30(b)(6) deposition notice on Plaintiff Traditions Ltd. We believe that the topics included with the notice are duplicative of exhaustive testimony already given by Traditions' co-owner Michael Schumann. Given that Mr. Schumann would be Traditions' sole 30(b)(6) designee, we believe that the proposed 30(b)(6) deposition would impose an unnecessary, undue burden on Mr. Schumann.

We are in the process of meet & confer discussions with Defendants and we remain optimistic that the parties can agree on an alternative to a live deposition. If we are unable to do so, we will file a motion for a protective order. We provide this notice pursuant to Paragraph 5 of the Fourth Amended Scheduling Order.

Sincerely,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.



Jesse M. Calm

JMC/sml

cc: Counsel of Record (Via ECF)